

EXHIBIT A

Declaration of Jamie Lee

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-
GUERRA, MICHAEL MAERLENDER, BRANDON
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON WILLIAMS,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,
THE TRUSTEES OF COLUMBIA UNIVERSITY IN
THE CITY OF NEW YORK, CORNELL
UNIVERSITY, TRUSTEES OF DARTMOUTH
COLLEGE, DUKE UNIVERSITY, EMORY
UNIVERSITY, GEORGETOWN UNIVERSITY, THE
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS
INSTITUTE OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU
LAC, THE TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125-MEK

Judge Matthew F. Kennelly

**DECLARATION OF JAMIE LEE IN SUPPORT OF OPPOSITION TO PLAINTIFFS'
MOTION TO LIMIT REDACTION OF DONOR NAMES AS TO
NORTHWESTERN AND YALE**

I, Jamie Lee, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have been admitted *pro hac vice* before this Court. I am a senior associate at Hogan Lovells US LLP and counsel for Defendant Yale University (“Yale”). I make this Declaration in Support of Opposition to Plaintiffs’ Motion to Limit Redaction of Donor Names as to Northwestern and Yale. This declaration is based on my personal knowledge.

2. On May 2, 2023, Plaintiffs met and conferred with Yale regarding FERPA redactions on certain documents produced by Yale that included donor information.

3. During the meet and confer, Plaintiffs’ counsel stated that where a donor name could lead to the identification of an applicant, like the name of a parent or family member, it was appropriate to redact that donor name pursuant to FERPA. However, if a donor name could not lead to the identification of an applicant, Plaintiffs’ position was that redaction was not appropriate.

4. Yale’s counsel explained that Yale had applied FERPA redactions consistent with Plaintiffs’ view and only redacted names of an applicant’s family member (and portions of a description that could potentially identify the family member), but left names of individuals who had no apparent familial connection to the applicant unredacted.

5. Plaintiffs’ counsel acknowledged that their review of Yale’s FERPA redactions was consistent with what Yale had described and agreed that Yale’s redactions were consistent with what FERPA requires and what the Confidentiality Order permits.

6. Attached as Exhibit 1 to this Declaration is an email I sent to Plaintiffs’ counsel after our telephone conversation confirming my understanding of that conversation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of May 2023, at Washington, D.C.

By: /s/ Jamie Lee
Jamie Lee

EXHIBIT 1

Lee, Jamie

From: Robert E. Litan <rlitan@bm.net>
Sent: Tuesday, May 2, 2023 3:42 PM
To: Lee, Jamie; Hope Brinn
Cc: Loughlin, Chuck; Holt, Benjamin F.
Subject: RE: 568 Case - Yale's Insurance Policy

[EXTERNAL]

Jamie and Chuck,

We agree that the meeting was productive, and thanks for the Bates no on the Insurance policy. However, just to be clear, we still believe that the judge needs to decide the scope of FERPA's application to the donor redaction issue. This is especially important given the upcoming deposition of Joan O'Neill on May 24.

Robert E. Litan / Shareholder

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PHILADELPHIA, PA 19103

From: Lee, Jamie <jamie.lee@hoganlovells.com>
Sent: Tuesday, May 2, 2023 2:35 PM
To: Hope Brinn <hbrinn@bm.net>; Robert E. Litan <rlitan@bm.net>
Cc: Loughlin, Chuck <chuck.loughlin@hoganlovells.com>; Holt, Benjamin F. <benjamin.holt@hoganlovells.com>
Subject: 568 Case - Yale's Insurance Policy

Hi Bob and Hope,

Thanks again for the productive conversation. We are glad Plaintiffs agree that Yale's FERPA redactions have been consistent with the FERPA and Confidentiality Orders and a motion as to Yale is not necessary.

As a follow up to our conversation, Yale's insurance policy is at: YALE_LIT_0000019690.

Jamie Lee

Senior Associate

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